CHAITMAN LLP

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Attorneys for Defendants

Presentment Date: November 19, 2018 12:00 PM

Objection Date: November 12, 2018

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ESTATE OF AUDREY WEINTRAUB; and ROBERT WEINTRAUB, individually and in his capacity as personal representative of the Estate of Audrey Weintraub,

Defendants.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04487 (SMB)

DECLARATION OF HELEN DAVIS CHAITMAN IN SUPPORT OF APPLICATION TO WITHDRAW AS COUNSEL

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C.

§1746, as follows:

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I am a partner with Chaitman LLP, counsel of record to Defendants Estate of

Audrey Weintraub, and Robert Weintraub, individually and in his capacity as personal

representative of the Estate of Audrey Weintraub, (the "Defendants"). I submit this declaration in

support of an application for an Order pursuant to Rule 2090-1(e) of the Local Bankruptcy Rules

of this Court: (1) authorizing Chaitman LLP to withdraw as counsel to the Defendants; and (2)

granting such other and further relief as the Court deems just and proper. Unless otherwise stated,

the foregoing is based on my personal knowledge.

2. The Trustee commenced this adversary proceeding against the Defendants on

November 30, 2010 (the "Adversary Proceeding").

3. Thereafter, the Defendants retained Becker & Poliakoff LLP to represent them.

4. On behalf of the Defendants, while at Becker & Poliakoff, LLP, I filed a Notice of

Appearance on June 9, 2011 (ECF Doc. No. 11).

5. On behalf of the Defendants as a partner of Chaitman LLP, I filed a Notice of

Appearance and Request for Service of Papers on October 26, 2015 (ECF Doc. No. 47).

6. Differences have arisen which make it impossible for me to continue to represent

the Defendants.

1.

7. The Adversary Proceeding will not be disrupted or unduly delayed as a result of

this firm's withdrawal as Defendants' counsel.

8. Accordingly, cause exists to grant the application authorizing Chaitman LLP to

withdraw as counsel for the Defendants.

Dated: October 29, 2018

New York, New York

/s/ Helen Davis Chaitman

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